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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

(Write the full name of the plaintiff in this action.)

Include prisoner registration number.)

Shawon Jones*1254397

v. JENNIFER PRICE
RICHARD MERTEER
JEREMIAH KETCHED
JEFF TURNER

John-Madley Dayton

(Write the full name of each defendant. The caption

must include the names of *all* of the parties.)

Fed. R. Civ. P. 10(a). Merely listing one party and

writing "et al." is insufficient. Attach additional

sheets if necessary.)

Case No: 4:19-cv-01186-CDP

(to be assigned by Clerk of District Court)

Plaintiff Requests Trial by Jury

Yes No

"Amended Complaint"

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff should not send exhibits, affidavits, witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the \$400.00 filing fee or an application to proceed without prepayment of fees and costs.

I. The Parties to this Complaint

A. The Plaintiff

Name: Shawon Jones

Other names you have used: _____

Prisoner Registration Number: 1254397

Current Institution: ERDCC

EASTERN RECEPTION DIAGNOSTIC CENTER
2727 HIGHWAY K
BONNE TERRE, MO 63628

Indicate your prisoner status:

Pretrial detainee

Convicted and sentenced state prisoner

Civilly committed detainee

Convicted and sentenced federal prisoner

Immigration detainee

Other (explain): _____

B. The Defendant(s)

To the best of your knowledge, give the information below for each defendant named in the caption of this complaint. Make sure the defendant(s) named below are the same as those listed in the caption of this complaint. Attach additional pages if necessary.

For an individual defendant, include the person's job title, and check whether you are suing the individual in his or her individual capacity, official capacity, or both.

Defendant 1

Name: JENNIFER PRICE

Job or Title: F.U.M.; Function unit manager

Badge/Shield Number: 107276

Employer: MDOC; Potosi Correctional Center

Address: _____

yes

Individual Capacity

JAS

Official Capacity

STATEMENT OF CLAIMS

1) JENNIFER PRICE;
1) On 3-13-18 PLAINTIFF WAS PLACED ON
SPECIAL (SSO'S) SECURITY ORDERS BY
DEFENDANT PRICE.
2) THE SPECIAL SECURITY ORDERS
WITHIN THEMSELVES WERE ATYPICAL
TO REGULAR OR EVERYDAY PRISON CONDI-
TIONS.
3) THEY VIOLATED MY EIGHT, FIRST, FIFTH,
AND FOURTEENTH AMENDMENTS UNDER
THE U.S. CONSTITUTION.
4) BETWEEN 3-13-18 AND 4-18-18 SSO'S DEPRIVED
PLAINTIFF OF INADEQUATE LIVING CON-
DITIONS, CLOTHING, FURNISHINGS, MAID,
VISITATION, FOOD, ACCESS TO LAW LIBRARY,
ACCESS TO COURTS AND PRACTICING OF RELIGI-
ON.
5) ON 3-13-18 PLAINTIFF WAS ONLY ALLOWED
(1) PAIR OF BOXERS. THEN ON 4-18-18 WAS
GIVEN A T-SHIRT. HOWEVER DURING THIS
TIME THE PLAINTIFF WASN'T GIVEN OR
OFFERED A TOOTHBRUSH, TOOTHPASTE OR
A SHOWER. ALSO THE CELD WAS BARE
WITH NOTHNG IN IT. WASN'T ALLOWED
ACCESS TO THE COURTS OR LAW LIBRARY.
MAINLY DUE TO SSO'S SPECIFYING THAT I
COULDN'T BE IN POSSESSION OF PAPER,
WRITING UTENSILS OR ANY SUCH
ARTICLES. LASTLY, WASN'T ABLE TO
PRACTICE RELIGION DUE TO NOT
HAVING A HOLY QURAN OR NOT BEING
ABLE TO GROUN BEFORE AND AFTER
PRAYERS.

- 6) THE SPECIAL SECURITY ORDERS STARTED 3-13-18 AND DIDN'T END UNTIL 7-18-18. DUE TO THE CONDITIONS SURROUNDING THE SSO'S PLAINTIFF SUFFERED EMOTIONAL DISTRESS.
- 7) DEFENDANT PRICE IMPOSED AND EXACTED ATYPICAL CONDITIONS UPON PLAINTIFF. DEFENDANT PRICE PLACED AND SET FORTH SSO'S KNOWING THEY WERE INHUMANE. ALSO NEVER INTERVENED TO CHARGE SSO'S UNTIL NEARLY FORTY-DAYS AFTER THE INITIAL SSO'S.
- 8) PLAINTIFF JONES IS SUING DEFENDANT JEFFREY PRICE IN INDIVIDUAL CAPACITY FOR \$100,000 FOR PUNITIVE DAMAGES AND COMPENSATORY DAMAGES.

JEREMIAH KITCHEDD:

- 9) ON 4-13-18 PLAINTIFF WAS ASSAULTED BY DEFENDANT KITCHEDD AND FOUR OTHER CORRECTIONAL OFFICERS.
- 10) THE ASSAULT OCCURRED WHEN A FIVE MAN EXTRACTION TEAM SAVAGELY REMOVED PLAINTIFF FROM HIS CELL (AB*6).
- 11) DEFENDANT KITCHEDD INITIATED ACTION UPON HALF WAY THROUGH THE CELL THRUHOLE, STARTED THROWING OVER HAND PUNCHES AND ATTACKED PLAINTIFF.
- 12) ONCE AND FIVE CORRECTIONAL OFFICERS WERE INSIDE THE CELL THE ATTACK GOT WORSE BECAUSE ONCE THE PLAINTIFF WAS ON THE GROUND. THERE WERE PUNCHES, KICKS, KNEES AND STOMPING GOING ON.
- 13) DUE TO THIS BEATING THE PLAINTIFF

SUCCUMBED TO SEVERAL INJURIES. PLAINTIFF'S MOUTH WAS BUSTED AND LIPS WERE TWICE THEIR REGULAR SIZE, NOSE WAS BUSTED AND BLEEDING, A LACERATION IN WHICH LEFT EAR WAS ANATOMICALLY DISMEMBERED AND FACIAL SWOLLEN.

- 14) DEFENDANT'S ACTIONS WERE NOT APPRISED "IN A GOOD FAITH EFFORT TO MAINTAIN OR RESTORE DISCIPLINE", BUT INSTEAD WERE USED TO "MALICIOUSLY AND SADISTICALLY CAUSE HARM".
- 15) DURING THE ASSAULT NOTHING THE DEFENDANT DID WAS REASONABLE, BUT RATHER "THE UNNECESSARY AND WANTON INFILTRATION OF PAZI". BECAUSE DEFENDANT KILLED AND ASSISTED IN SAVAGE BEATING PLAINTIFF ENDURED NOR DID DEFENDANT ATTEMPT TO STOP THE ATTACK.
- 16) PLAINTIFF IS SUEING DEFENDANT JEREMIAH KETCHED IN INDIVIDUAL CAPACITY FOR \$100,000 FOR PUNITIVE DAMAGES AND COMPENSATORY DAMAGES.

RICHARD MERTEER;

- 17) ON 3-13-18 PLAINTIFF WAS PLACED ON SPECIAL (SSO'S) SECURITY ORDERS BY DEFENDANT MERTEER.
- 18) THE SPECIAL SECURITY ORDERS WITHIN THEMSELVES WERE ATYPICAL HARSHSHIP TO EVERYDAY OR REGULAR PERSON CONDITIONS.
- 19) THEY VIOLATED MY FIRST, FIFTH, EIGHT AND FOURTEENTH AMENDMENTS UNDER THE U.S. CONSTITUTION.
- 20) BETWEEN 3-13-18 AND 4-18-18 SSO'S

DEPRIVED PLAINTIFF OF INADEQUATE CLOTHING, FURNISHING, VESTIGATION, ACCESS TO COURTS, ACCESS TO LAW LIBRARY, MAX, LIVING CONDITIONS AND RIGHTS TO PRACTIZING RELIGION.

- 21) THE SPECIAL SECURITY ORDERS STARTED 3-13-18 AND DIDN'T END UNTIL 7-18-18. DUE TO THE CONDITIONS SURROUNDING THE SSO'S PLAINTIFF SUFFERED EMOTIONAL DISTRESS.
- 22) ON 3-13-18 PLAINTIFF WAS ONLY ALLOWED (1) PAIR OF BOXERS. THEN ON 4-18-18 WAS GIVEN A T-SHIRT. HOWEVER DURING THIS TIME THE PLAINTIFF WASN'T GIVEN OR OFFERED A TOOTHBRUSH, TOOTHPASTE, OR A SHOWER. ALSO THE CELL WAS BARE WITH NOTHING IN IT. WASN'T ALLOWED ACCESS TO THE COURTS OR LAW LIBRARY. MAINLY DUE TO THE SSO'S SPECIFYING THAT HE COULDN'T BE IN POSSESSION OF PAPER, WRITING UTENSILS OR ANY SUCH ARTICLES. LASTLY, WASN'T ABLE TO PRACTICE RELIGION DUE TO NOT HAVING A HOLY QURAN OR NOT BEING ABLE TO GROOM BEFORE AND AFTER PRAYERS.
- 23) PLAINTIFF JONES IS Suing DEFENDANT RICHARD MENTER IN INDIVIDUAL CAPACITY FOR \$100,000 FOR COMPENSATORY DAMAGES AND PUNITIVE DAMAGES.
- 24) John-Ridley Layton; On 3-12-18 PLAINTIFF WAS ASSAULTED BY DEFENDANT LAYTON AND FOUR OTHER CORRECTIONAL OFFICERS.
- 25) The assault occurred when a

MAR EXTRACTOR TEAM MALICIOUSLY FORCED PLAINTIFF FROM A SUICIDE CELL (T.C.U.#5) AND PLACED PLAINTIFF IN CELL (A.B.#6), WHICH WASN'T A SUICIDE CELL.

- 26) THE FIRST OFFICER ASSAULTED PLAINTIFF IN VIEW OF DEFENDANT DAYTON, THEN DEFENDANT YELLED "STOP RESISTING" (WHICH PLAINTIFF WASN'T DOING) WHILE SIMULTANEOUSLY PUNCHING PLAINTIFF IN THE MOUTH, WHICH CAUSED PLAINTIFF LIPS AND GUMS TO BLEED.
- 27) DEFENDANT DAYTON ACTIONS WERE USED TO "MALICIOUSLY AND GADISSTICALLY CAUSE HARM. RATHER THAN TO BE APPRAISED "IN A GOOD FAITH EFFORT TO MAINTAIN OR RESTORE DISCIPLINE.
- 28) PLAINTIFF JONES AS SIZING DEFENDANT JOHN-BRADLEY DAYTON IN INDIVIDUAL CAPACITY FOR \$100,000 FOR PUNITIVE DAMAGES AND COMPENSATORY DAMAGES.

JEFF TURNER,

- 29) ON 3-13-18 PLAINTIFF WAS PLACED ON SPECIAL (SSO'S) SECURITY ORDERS BY DEFENDANT TURNER.
- 30) BETWEEN 3-13-18 AND 4-18-18 SSO'S DEPRIVED PLAINTIFF OF INADEQUATE ACCESS TO COURTS, ACCESS TO LAW LIBRARY, MAIL, VISITATION, CLOTHING, FURNISHINGS, LIVING CONDITIONS, AND PRACTICE OF RELIGION.
- 31) ON 3-13-18 PLAINTIFF WAS ONLY ALLOWED (1) PAIR OF BOXERS, (1) THER

on 4-18-18 WAS GIVEN A T-SHIRT. HOWEVER DURING THIS TIME THE PLAINTIFF WASN'T GIVEN OR OFFERED A TOOTHBRUSH, TOOTHPASTE OR A SHOWER. ALSO THE CELL WAS BARE WITH NOTHING IN IT. WASN'T ALLOWED ACCESS TO THE COURTS, OR LAW LIBRARY. MAINLY DUE TO SSO'S SPECIFYING THAT PLAINTIFF BE IN POSSESSION OF PAPER, WRITING UTENSILS OR ANY SUCH ARTICLES. BASTING, WASN'T ABLE TO PRACTICE PRAYER DUE TO NOT HAVING A HOLY QURAN OR NOT BEING ABLE TO GROOM/WASH BODY BEFORE AND AFTER PRAYERS.

32) DEFENDANT TURNER INTENTIONALLY INFECTED ATYPICAL HARSH CONDITIONS UPON PLAINTIFF. DEFENDANT TURNER PLACED AND SET FORTH SSO'S KNOWING THEY WERE INHUMANE. ALSO NEVER INTERVENED TO CHANGE SSO'S UNTIL NEARLY FORTY-DAYS AFTER THE INFECTED SSO'S.

33) THE SPECIAL SECURITY ORDERS STARTED 3-13-18 AND DIDN'T END UNTIL 7-18-18. DUE TO THE CONDITIONS SURROUNDING THE SSO'S PLAINTIFF SUFFERED EMOTIONAL DISTRESS.

34) THEY VIOLATED MY FOURTEENTH, EIGHTH AND FIRST

AMENDMENTS UNDER THE U.S. CONSTITUTION.

35) THE SPECIAL SECURITY ORDERS WHETHER THEMSELVES WERE ATYPICAL TO REGULAR OR EVERYDAY PRISON CONDITIONS.

36) Plaintiff Jones IS SUING DEFENDANT TURNER IN INDIVIDUAL CAPACITY FOR \$100,000 FOR PUNITIVE DAMAGES AND COMPENSATORY DAMAGES.

THIS COURT SHOULD GRANT LEAVE FREELY TO AMEND A COMPLAINT. FOMAR V. DAVIS, 371 U.S. 178, 182 (1962).

9-16-20

RESPECTFULLY SUBMITTED,
Shawon Jones* 1254397
E.R.D.C.C.

2727 HIGHWAY K
BONNE TERRE, MO 63628

Defendant 2

Name: Jeremiah Hatchard

Job or Title: COI; CORRECTIONAL OFFICER

Badge/Shield Number: _____

Employer: MDOC; Potosi Correctional Center

Address: _____

Individual Capacity Official Capacity

II. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

SEE ATTACHMENTS

INJURIES,

- 1) DEFENDANT JEREMY KETCHED IS RESPONSIBLE FOR PLANTIFF JONES HAVING A BUSTED MOUTH AND LIPS WERE TWICE HER REGULAR SIZE, NOSE WAS BUSTED AND BLEEDING, AND A DAZZLER IN WHICH HER LEFT EAR WAS ANATOMICALLY DISMEMBERED AND JACKED SWEDEN.
- 2) DEFENDANT JOHN RAY DAYTON IS RESPONSIBLE FOR PLANTIFF JONES HAVING A BUSTED MOUTH, LIPS AND GUMS DUE TO DEFENDANT PUNCHING PLANTIFF IN THE MOUTH.
- 3) DEFENDANTS JENNIFER PRICE, JESS TURNER AND RICHARD MENTEE ARE RESPONSIBLE FOR PLANTIFF JONES, SIXTH, EIGHT AND FOURTEENTH AMENDMENTS UNDER THE U.S. CONSTITUTION BEING VIOLATED. DUE TO BEING ON GSO'S WHICH WERE INHUMANE. THESE GSO'S CAUSED PSYCHOLOGICAL HARM AND EMOTIONAL DISTRESS.
- 4) PLANTIFF JONES RECEIVED MEDICAL TREATMENT FOR THE ASSAULT BROUGHT BY DEFENDANT KETCHED, WAS CLEARED BY MEDICAL SURGEON TO CLEAR BLOOD OUT, LEFT EAR WAS CLEARED BACK ON.
- 5) PLANTIFF JONES DIDN'T RECEIVE ANY MEDICAL TREATMENT FOR THE ASSAULT THAT WAS ENDURED BY DEFENDANT DAYTON.

III. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

SEE ATTACHMENTS

RELEIF,

- 1) PLAINTIFF JONES RESPECTFULLY PRAYS THAT THIS COURT ENTER JUDGEMENT GRANTING PLAINTIFF, A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF'S RIGHTS UNDER THE U.S. CONSTITUTION AND LAWS OF THE UNITED STATES. ALSO \$500,000 THAT PLAINTIFF BELEIVES ENTITLED TO BECAUSE HIS RIGHTS WERE DISREGARDED.

IV. Relief

State briefly and precisely what you want the Court to do for you. Do not make legal arguments. Do not cite any cases or statutes. If you are requesting money damages, include the amounts of any actual damages and/or punitive damages you are claiming. Explain why you believe you are entitled to recover those damages.

SEE ATTACHMENT S^e

V. Exhaustion of Administrative Remedies/Administrative Procedures

The Prison Litigation Reform Act (“PLRA”) 42 U.S.C. § 1997e(a), requires that “[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted.”

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes No

If yes, name the jail, prison or other correctional facility where you were confined at the time of the events giving rise to your claim(s):

MDX, Potosi Correctional Center

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes No Do not know

C. If yes, does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claims?

Yes No Do not know

If yes, which claim(s)? *I've filed my grievance or claims regarding excessive force and unlawful conditions of confinement.*

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

Yes No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes No

E. If you did file a grievance: *On 9-7-18 with CCMII; JERRIER Eddiemar.*

1. Where did you file the grievance? *Potosi Correctional Center
11593 State Highway 0
Marieant Point, MO 63660*

2. What did you claim in your grievance? (Attach a copy of your grievance, if available) *SEE ATTACHMENT*

3. What was the result, if any? (Attach a copy of any written response to your grievance, if available) *SEE ATTACHMENT*

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (*Describe all efforts to appeal to the highest level of the grievance process.*) *I'VE FILED AN IRR, GRIEVANCE, AND GRIEVANCE APPEAL.*

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.) SEE ATTACHMENTS:

VI. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

A. To the best of your knowledge, have you ever had a case dismissed on the basis of this “three strikes rule”?

Yes No

If yes, state which court dismissed your case and when it was dismissed. Attach a copy of the court’s order, if possible.

Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (*If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.*)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (*if federal court, name the district; if state court, name the state and county*)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

Yes

No (*If no, give the approximate date of disposition*): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

Yes

No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (*if federal court, name the district; if state court, name the state and county*)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

Yes

No (If no, give the approximate date of disposition): NO LAWSUIT

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

VII. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16 day of SEPTEMBER, 2020.

Signature of Plaintiff

Sheaon Jones

INFORMAL RESOLUTION REQUEST

OFFENDER NAME AND NUMBER: Jones, Shawon 1254397

IRR LOG NUMBER: PCC 18-1025

Category: 7A

HOUSING UNIT: HU #2C 9

NATURE OF COMPLAINT:

You complain of an inappropriate used of force perpetrated upon you, on 04/13/2018. You feel that, a use of force, is cruel and unusual punishment, and it violated the 8th Amendment. You request the termination of the officers involved, and/or punitive and compensatory damages.

FINDINGS:

Your IRR and all pertinent information/documentation have been received and reviewed. A five man extraction team was utilized to forcibly remove you from your cell, on 04/13/2018. I find that you refused to comply with directives to allow your restraints to be applied. This led to a use of force. The use of force was not excessive and was made necessary by your actions. Your IRR is denied.

Recommendation:

No further action necessary.

J. Eddleman CCM II
Investigating Staff Signature

J. P. R. R.
Functional Unit Manager

Will D.
Assistant Warden

9/28/18
Date

10/1/18
Date

10-1-18
Date



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
INFORMAL RESOLUTION REQUEST

ORIGINAL

INSTITUTION USE ONLY

EMERGENCY COMPLAINT

OFFENDER NAME	Shawon Jones		
DATE STAFF MEMBER RECEIVED IRR	COMPLAINT NUMBER	CATEGORY	DOC NUMBER
9/12/18	PCC 18-1025	7A	1254397
HOUSING UNIT 2			

STATE YOUR COMPLAINT/PROBLEM BRIEFLY- ONE ISSUE - BE SPECIFIC

On 4-13-18 EXCESSIVE FORCE WAS USED MALICIOUSLY AND SADISTICALLY.
 When five correctional officers on a movement team were
 responsible for unnecessary and wanton infliction of pain.
 This is cruel and unusual punishment and violates
 my eighth amendment rights. Also experienced emotional distress.
 Note: This is the third time I'm attempting to file this IRR. Due to
 constant caseworkers moving in/out of a house my IRR has been
 mishandled in the past.

ACTION REQUESTED: STATE REMEDIES YOU ARE SEEKING

PUNITIVE AND COMPENSATORY DAMAGES, TEMPORARY RESTRAINT ORDER,
 RESTRAINT IN REGARDS TOWARDS TACTIC'S ON MOVEMENT TEAM AND
 DEMOTION FROM CURRENT POSITION OR BE FIRED FROM MDOC.

OFFENDER SIGNATURE	STAFF USE ONLY	DATE
Shawon Jones		9-7-18

DISCUSSION OF COMPLAINT (SUMMARIZE RESULTS OF MEETING)

Not Resolved

<input type="checkbox"/> IRR RESOLVED BY DISCUSSION/WITHDRAWN	<input checked="" type="checkbox"/> IRR NOT RESOLVED BY DISCUSSION	
OFFENDER SIGNATURE	STAFF SIGNATURE	DATE
Shawon Jones	J. Eddleman	9/12/18

STAFF FINDINGS/RESPONSE

INVESTIGATING STAFF SIGNATURE	DATE	RESPONDENT SIGNATURE	DATE
J. Eddleman ccm II	9/28/18	J. Price	10/1/18
VIEWER SIGNATURE	DATE	RESULTS	
Willie B. Aar	10-1-18	<input type="checkbox"/> SATISFACTORY	<input type="checkbox"/> UNSATISFACTORY

YOU HAVE THE RIGHT TO FILE A FORMAL GRIEVANCE. YOU MUST FILE A GRIEVANCE FORM WITH THE DESIGNATED STAFF WITHIN SEVEN (7) DAYS FROM THE DATE YOU RECEIVE THIS RESPONSE. FAILURE TO SUBMIT A GRIEVANCE WITHIN THIS TIME FRAME CONSTITUTES ABANDONMENT.

OFFENDER SIGNATURE	DATE
--------------------	------



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
OFFENDER GRIEVANCE

GRIEVANCE NUMBER	IRR NUMBER	DATE FILED
PCC-18-1025	PCC 18-1025	10-19-18

INSTITUTION USE ONLY

7

OFFENDER LAST NAME	FIRST	DOC NUMBER	HOUSING UNIT	UNIT	INSTITUTION
Jones	Shawon	1254397	2	C	PCC

OFFENDER GRIEVANCE/REQUEST

My U.S. CONSTITUTIONAL RIGHTS WERE VIOLATED BY AN EXTRACTOR TEAM ON 4-13-18. AN EXCESSIVE USE OF FORCE WAS APPLIED. I had a busted and swollen nose that bled uncontrollably. Busted and swollen lips which were twice their regular size, had a laceration in which left ear was anatomically dismembered and other facial swelling that lasted five days. The force applied was excessive because once I was subdued in restraints I was struck, punched, kicked and stomped in my head, back and facial area over 40 to 50 times. All which occurred while I layed on cell floor. This force was not applied "in a good faith effort to maintain or restore discipline" but instead was used "maliciously and sadistically causing harm". Therefore the extraction team is responsible for causing unnecessary and wanton infliction of pain. This is cruel and unusual punishment and violates my U.S. CONSTITUTIONAL RIGHTS under the EIGHT AMENDMENT.

OFFENDER SIGNATURE

Shawon Jones

DATE

10/8/18

SUPERINTENDENT RESPONSE

0

Grievance
Response
Attached

OFFENDER COPY

SUPERINTENDENT/SECTION HEAD

Shawon Jones

DATE

12/13/18

You have the right to appeal this decision to a division director. You must file an appeal form with the grievance officer within seven (7) days from the day you receive this decision. Failure to submit an appeal within this time frame constitutes abandonment of the grievance.

I ACCEPT THIS DECISION

I APPEAL THIS DECISION

OFFENDER SIGNATURE

DATE

**Potosi Correctional Center
Grievance Response**

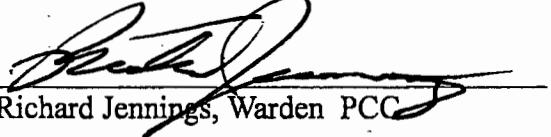
Register # 1254397 Jones, Shawon

Grievance # PCC-18-1025

OFFENDER COPY

The grievance in which you claim an inappropriate use of force was perpetrated upon you, 4-13-18 has been reviewed. Your requested action is that staff involved be removed from duty and that you receive compensatory damages.

Upon review of pertinent information you refused to comply with numerous directives to allow application of restraints. The force employed was that which was minimally necessary to control and maintain order and security. Grievance Denied.


Richard Jennings, Warden PCC

12/13/18

Date

Reviewed

OFFENDER COPY

ORIGINAL



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
OFFENDER GRIEVANCE APPEAL

OFFENDER NAME (LAST NAME, FIRST)

Jones, S.

REASON FOR APPEAL

SEE ATTACHMENT

GRIEVANCE NUMBER PCC-18-B25	DATE FILED 1-10-19
DOC NUMBER 1256847	INSTITUTION PCC

OFFENDER SIGNATURE

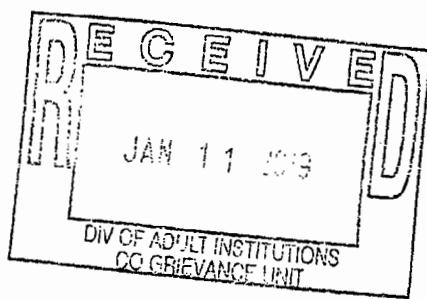
Sharon Jones

DATE

1-7-19

RESPONSE

OFFENDER COPY



SIGNATURE

DATE

Finalization of this appeal represents exhaustion of this grievance pursuant to federal law, 28 CFRs 40

OFFENDER SIGNATURE

DATE

I (Shawon Jones #1254397) would continue to appeal this decision because EXCESSIVE FORCE WAS APPLIED. On 4-13-18 an CELL EXTRACTION (CERT TEAM) RESPONSE TEAM WAS called to my cell 2B "6" led or overseen by CO II, SGT. SKAGGS. I WAS GIVEN "ONE" DIRECTIVE PER. CO II, SGT. SKAGGS TO SUBMIT TO RESTRAINTS, AND I REFUSED SOLELY BECAUSE I WAS TOLD TO LAY ON THE FLOOR INSTEAD OF BEING CARRIED THROUGH THE FOODPORT. AS AN INITIAL RESULT OF MY REFUSAL MY CELL DOOR WAS OPENED/ROLLED "ONE-THIRD" OF WAY. THE ATTACK BEGAN AS CO II, CERT MEMBER #1, KITCHELL BEGAN TO RAIN OVER HAND PUNCHES ON MY HEAD AND FACIAL AREA. DUE TO THIS I STEPPED BACKWARDS INTO THE CELL, THE CELL DOOR WAS COMPLETELY OPENED AND THE CERT TEAM IMMEDIATELY ENCLOSED ME IN THE CORNER OF THE CELL AND VIOLENTLY POUNDED ON MY HEAD, UPPER BODY AND FACIAL AREA. TO NO AVAIL COULD I PREVENT THE BLOWS, SO I SCRAMBLED AROUND THE CELL AND LAYED ON THE CELL FLOOR "WHERE I COULDNT POSS ~~BE~~ AS A THREAT TO MYSELF NOR THE CERT TEAM". EVERYTHING BEYOND THIS POINT WAS "EXCESSIVE FORCE" BECAUSE IT "WASN'T APPLIED" IN "AN EFFORT TO MAINTAIN OR RESTORE DISCIPLINE" BUT WAS USED TO "MALICIOUSLY AND SADISTICALLY CAUSE HARM AND UNNECESSARY AND WANTON INFILCTION OF PAIN" BECAUSE I WAS LAYING ON THE CELL FLOOR. HOWEVER WITH ME LAYING ON THE FLOOR THE ATTACK BECAME EVER MORE BRUTAL AND SAVAGE DUE TO THE CERT MEMBERS) KICKING, PUNCHING, STOMPING AND DROPPING WHATEVER ELSE THEY WERE DOING TO ME. AS A RESULT OF THE BEATING I SUFFOCATED TO BUSTED AND SWOLLEN LIPS THAT WERE TWICE THEIR NORMAL SIZE, BUSTED AND SWOLLEN NOSE, A LACERATION IN WHICH MY LEFT EAR WAS ANATOMICALLY DISMEMBERED AND OTHER FACIAL SWELLINGS. ALSO DURING THIS ENTIRE INCIDENT THE ONLY DIRECTIVE GIVEN WAS GIVEN "ONE" BY CO II, SGT. SKAGGS. THE CERT TEAM NEVER ASKED ME TO SUBMIT, BUT INSTEAD BEAT ME INTO (BLOODY PULP) SUBMISSION. DUE TO MY INJURIES ~~THE~~ MINIMUM FORCE "WAS NOT" USED AND INSTEAD EXCESSIVE FORCE WAS IN DEED APPLIED. THIS IS CRUEL AND UNUSUAL PUNISHMENT AND VIOLATES MY U.S. CONSTITUTIONAL RIGHTS PROTECTED UNDER THE EIGHT ~~AMENDMENT~~ AMENDMENT.

I WOULD APPRECIATE IF THE USE OF FORCE ENMATE WAS REVIEWED AS WELL AS ANY OR ALL CAMARAS LOCATED IN 2B THAT HAS A VIEW OF CELL #6 AND ~~CH~~ ALSO LOOK INTO MY MEDICAL FILE ~~TO~~ TO VERIFY INJURIES.

Shawon Jones

1-7-19

Michael L. Parson
Governor



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Fax: 573-751-4099

Anne L. Precythe
Director

State of Missouri
DEPARTMENT OF CORRECTIONS
"Improving Lives for Safer Communities"

Grievance Appeal Response

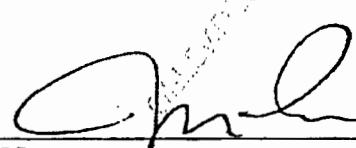
February 28, 2019

Shawon Jones
Register #1254397
Potosi Correctional Center

RE: PCC-18-1025
Use of Force
Received on January 11, 2019
Reviewed on February 28, 2019

OFFENDER COPY

Your appeal dated January 7, 2019, has been reviewed. On August 1, 2018, the Use of Force Committee reviewed the use of force, which occurred on April 13, 2018, at approximately 1:26 p.m. in the Housing Unit Two B-wing, cell 06. The review included all documents, statements, video footage, descriptions of the type of force employed, a description of injuries and treatment given. The committee determined the minimal amount of force was used to control the incident. It was also determined the force was necessary to maintain good order and security. There is no evidence to support your claim of excessive force being used during the incident on April 13, 2018. Missouri Department of Corrections policy D5-3.2-Offender Grievance states, *"Consequential or punitive damages will not be provided."* Your appeal is denied.



Jeff Norman

Deputy Division Director
Division of Adult Institutions

JN/st

OFFENDER COPY



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
INFORMAL RESOLUTION REQUEST

ORIGINAL

INSTITUTION USE ONLY

EMERGENCY COMPLAINT

OFFENDER NAME

Shawon Jones

DOC NUMBER

1254397

DATE STAFF MEMBER RECEIVED IRR

9/12/18

COMPLAINT NUMBER

PCC 18-1026

CATEGORY

DOE PROCESS

HOUSING UNIT

2c

STATE YOUR COMPLAINT/PROBLEM BRIEFLY- ONE ISSUE - BE SPECIFIC

SEE ATTACHMENT

SECTION REQUESTED: STATE REMEDIES YOU ARE SEEKING

SEE ATTACHMENT

OFFENDER SIGNATURE

Shawon Jones

DATE

9-7-18

STAFF USE ONLY

DISCUSSION OF COMPLAINT (SUMMARIZE RESULTS OF MEETING)

Not Resolved

IRR RESOLVED BY DISCUSSION/WITHDRAWN

IRR NOT RESOLVED BY DISCUSSION

OFFENDER SIGNATURE

Shawon Jones

DATE

9-12-18

STAFF SIGNATURE

J. Edelman

DATE

9/12/18

STAFF FINDINGS/RESPONSE

ESCALATING STAFF SIGNATURE

J. Edelman

DATE

9/28/18

RESPONDENT SIGNATURE

Shawon Jones

DATE

10/1/18

VIEWER SIGNATURE

Bill. M. AA

DATE

10-1-18

RESULTS

SATISFACTORY

UNSATISFACTORY

U HAVE THE RIGHT TO FILE A FORMAL GRIEVANCE. YOU MUST FILE A GRIEVANCE FORM WITH THE DESIGNATED STAFF WITHIN SEVEN (7) DAYS FROM THE DATE U RECEIVE THIS RESPONSE. FAILURE TO SUBMIT A GRIEVANCE WITHIN THIS TIME FRAME CONSTITUTES ABANDONMENT.

OFFENDER SIGNATURE

DATE



Informal Resolution Request

OFFENDER NAME AND NUMBER: Jones, Shawon 1254397

IRR LOG NUMBER: PCC 18-1026

HOUSING UNIT: HU 2C-09

CATEGORY: 3C

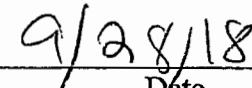
NATURE OF COMPLAINT: You state that, on 03/13/2018, your procedural rights were violated. You were placed on Special Security Orders, based on conduct violation PCC 18-00571, that you were never found guilty of. The security orders caused you emotional and physical distress. You are requesting punitive and compensatory damages, and a demotion or termination of the staff involved.

FINDINGS: Your IRR and all pertinent information/documentation have been received and reviewed. You were placed on Special Security Orders due to your behavior. This decision was made, collectively, between Administrative, Custody, Classification and Mental Health Personnel. Your special security orders were constantly reviewed by Administrative (Warden) and Mental Health Contract Monitors to ensure due process and MODOC policies and procedures were not violated. Your IRR is denied.

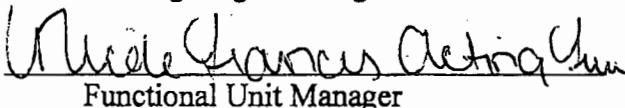
RECOMMENDATION: No further actions necessary.



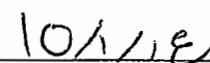
Investigating Staff Signature



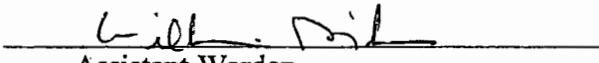
Date



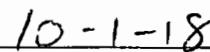
Functional Unit Manager



Date



Assistant Warden



Date



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
OFFENDER GRIEVANCE

ORIGINAL

GRIEVANCE NUMBER	IRR NUMBER	DATE FILED
AT-18-1026	QCC18-1026	10-19-18

INSTITUTION USE ONLY

3

OFFENDER LAST NAME	FIRST	DOC NUMBER	HOUSING UNIT	UNIT	INSTITUTION
Jones	Shawon	125439M	2	C	PCC

OFFENDER GRIEVANCE/REQUEST

I WAS PLACED ON (SSO) FOR OVER A HUNDRED DAYS AND WAS NEVER PROVIDED WITH SOME LEVEL OF PROCESS. ALSO WASN'T PROVIDED WITH ANY AMOUNT OF PROTECTION (LIKE A HEARING OR NOTICE). HOWEVER THE ADMINISTRATIVE AND CUSTODY STAFF, TONY PRICE, LT. PRICE, CP. MCNEEER AND THE WARDER AGREED AND SIGNED OFF ON (SSO'S), WHICH VIOLATES MY PROCEDURAL DUE PROCESS AND SUBJECTED ME TO FALSE IMPRISONMENT. I WAS SUBJECTED TO TREATMENT AND/OR CONDITIONS THAT ARE IN ATYPICAL AND SIGNIFICANT HARSHNESS IN RELATION TO THE ORDINARY INCIDENTS OF PRISON LIFE. IT WAS SAID THAT I WAS SOLELY ON (SSO) BECAUSE OF CIV# PCC18-00571. I WAS DISCIPLINED WITHOUT THE CHANCE TO CALL WITNESS TESTIMONY, HAVE A HEARING OR PRESENT EVIDENCE. THIS WAS A COMPLETE DISREGARD OF MY EIGHTH AMENDMENT UNDER THE U.S. CONSTITUTION, DELIBERATE INDIFERRENCE, FOR I WAS NOT AFFORDED THE SAME AMENITIES AS THE OTHER COMPLYING OFFENDERS WHO ARE FOCUSED ON COMPLETING THEIR ALLOTTED AD-SIGN TIME. THIS PUNISHMENT IS BASED ON A VAGUE CLAIM. DUE TO THIS MY EIGHTH, FIRST, FIFTH, FOURTEENTH AND FOURTH AMENDMENT CONSTITUTIONAL RIGHTS WERE VIOLATED.

NOTE: CIV# PCC18-00571 WAS DISMISSED AND EXPIRED ON 8-30-18 (AFTER I WAS ON SSO'S) AND THIS INCIDENT OCCURRED ON 3-13-18.

OFFENDER SIGNATURE

Shawon Jones

DATE

10/18/18

SUPERINTENDENT RESPONSE

OFFENDER COPY

GRIEVANCE
RESPONSE
ATTACHED

SUPERINTENDENT/SECTION HEAD

DATE

12/11/18

You have the right to appeal this decision to a division director. You must file an appeal form with the grievance officer within seven (7) days from the day you receive this decision. Failure to submit an appeal within this time frame constitutes abandonment of the grievance.

 I ACCEPT THIS DECISION I APPEAL THIS DECISION

OFFENDER SIGNATURE

DATE

**Potosi Correctional Center
Grievance Response**

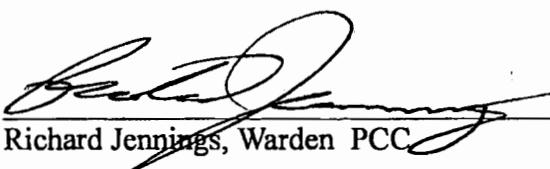
Register # 1254397 Jones, Shawon

Grievance # PCC-18-1026

OFFENDER COPY

The grievance in which you claim violation of procedural and institutional rights has been reviewed. Your requested action is termination of administrative staff and monetary compensation.

This review finds your assignment to administrative segregation has been reviewed in compliance with policy guidelines. Application of special security orders are recommended upon collective assessment of mental health, classification, custody and administrative staff. You indicate you/contempt for these actions initiated 3-13-18, however you failed to submit a complaint until 9-12-18 at which time your right to do so had expired. Be advised an offender who wishes to submit a complaint must do so within 15 days of the incident. Grievance Denied.


Richard Jennings, Warden PCC

12/11/18

Date
Reviewed

OFFENDER COPY



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
OFFENDER GRIEVANCE APPEAL

ORIGINIAL

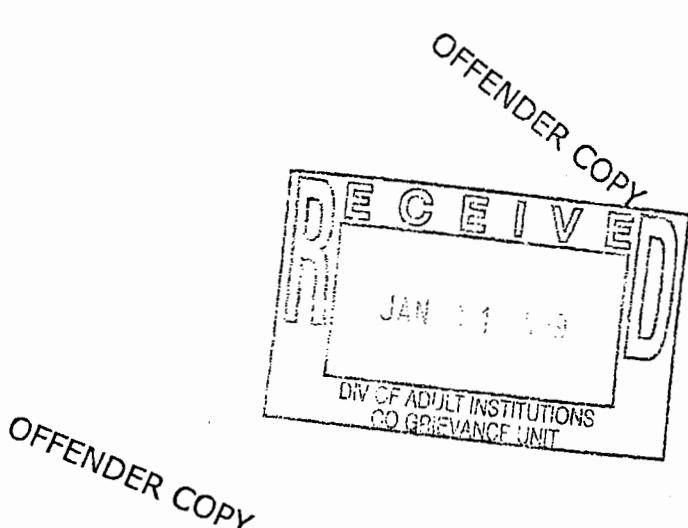
OFFENDER NAME (LAST NAME, FIRST)	GRIEVANCE NUMBER	DATE FILED
Jones S.	PCC-18-1026	1-10-19

REASON FOR APPEAL

SEE ATTACHMENT

OFFENDER SIGNATURE	DATE
Shawn Jones	1-7-19

RESPONSE



OFFENDER COPY

SIGNATURE	DATE
-----------	------

Finalization of this appeal represents exhaustion of this grievance pursuant to federal law, 28 CFRs 40

OFFENDER SIGNATURE	DATE
--------------------	------

Michael L. Parson
Governor



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Fax: 573-751-4099

Anne L. Precythe
Director

State of Missouri
DEPARTMENT OF CORRECTIONS
"Improving Lives for Safer Communities"

Grievance Appeal Response

March 1, 2019

Shawon Jones
Register #1254397
Potosi Correctional Center

RE: PCC-18-1026
Due Process
Received on January 11, 2019
Reviewed on March 1, 2019

OFFENDER COPY

Your appeal dated January 7, 2019, has been reviewed. The grievance response you received adequately addressed your complaint regarding claims the Special Security Orders issued June 21, 2018, were unjust. The Special Security Orders were issued due to your maladaptive behavior. Conduct violation records indicate you received nine conduct violations in 2018. Among the nine violations, you received two for assault, and two for threats. You failed to provide any evidence to support your complaint. Your appeal is denied.


Jeff Norman
Deputy Division Director
Division of Adult Institutions

JN/st

OFFENDER COPY

**Potosi Correctional Center
Grievance Response**

Register # 1254397 Jones, Shawon

Grievance # PCC-18-846

The grievance in which you state that CCM J. Jones has failed to process numerous IRR complaints in a timely manner has been reviewed. Your requested action is to pursue such complaints via the IRR process.

This review finds response provided at the IRR level of this compliant indicates two IRR level complaints PCC-18-582 and 18-677 which were not processed in a timely manner. It is noted that both of these complaints have now been processed. Response provided at the IRR level on 8-10-18 encouraged you to utilize the IRR process for any complaints which you believe were not processed. It is noted that in the nearly sixty days since this arrangement you have not pursued any old issues. Recent classification assignment changes provide assignment of a case manger in each wing of housing unit two which should resolve your concerns. This should resolve your compliant.

Richard Jennings, Acting Warden
Richard Jennings, Warden PCC

10-5-18

Date
Reviewed

OFFENDER COPY



STATE OF MISSOURI
DEPARTMENT OF CORRECTIONS
OFFENDER GRIEVANCE APPEAL

GRIEVANCE NUMBER	DATE FILED
PCC-18-846	11-30-18
DOC NUMBER	INSTITUTION
1254397	PCC

OFFENDER NAME (LAST NAME, FIRST)

Jones S.

REASON FOR APPEAL

CCM. Jones failed to process numerous IRR complaints in a timely manner in accordance with Department of Corrections, IRR/GRIEVANCE policy and procedure. In which case IRR's pcc18-582 and pcc18-677 were not properly handled in the allowed time frame. Also IRR's pcc18-10246 and pcc18-10245 were also mishandled by CCM. Jones as well. These IRR's had to be filed late — took over sixty days until I was assigned a new caseworker. These were and issues that CCM. Jones refused to submit or pushed/should off.

1107-RECEIVED

OFFENDER SIGNATURE

Shaeum Jones

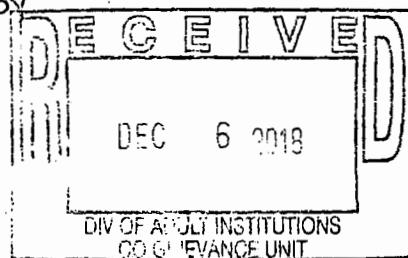
DATE

11/5/18

RESPONSE

OFFENDER COPY

OFFENDER COPY



1107-RECEIVED

SIGNATURE

DATE

Finalization of this appeal represents exhaustion of this grievance pursuant to federal law, 28 CFRs 40

OFFENDER SIGNATURE

DATE

Michael L. Parson
Governor



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Anne L. Precythe
Director

State of Missouri
DEPARTMENT OF CORRECTIONS
"Improving Lives for Safer Communities"

Grievance Appeal Response

February 1, 2019

Shawon Jones
Register #1254397
Potosi Correctional Center

OFFENDER COPY

RE: PCC-18-846
Other
Received on December 6, 2018
Reviewed on February 1, 2019

Your appeal dated November 5, 2018, has been reviewed. The grievance response you received adequately addressed your complaint regarding responses to Informal Resolution Request complaints you had previously filed. You are encouraged to continue with the grievance process on issues you wish to have addressed. Your appeal is denied.

Ryan Crews

Ryan Crews

Deputy Division Director
Division of Adult Institutions

RC/st

OFFENDER COPY